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January 4, 2012

BY ELECTRONIC FILING

Honorable Jose L. Linares
United States District Court
District of New Jersey
M.L. King Jr. Federal Bldg. & Courthouse, Room 5054
50 Walnut Street
Newark, NJ 07101

SO ORDERED:
DATED: 1/5/12

Re: *Rahman v. Kid Brands, et al.*, No. 11-cv-0624 (JLL) (MAH)

Dear Judge Linares:

We are Lead Counsel for Lead Plaintiff in the above-referenced matter. We write to respond to the letter filed by Defendants today seeking dismissal of the complaint on the grounds that Plaintiff filed no opposition to Defendants' motion to dismiss by December 28, 2011. As Defendants correctly note in their letter, pursuant to a stipulation so ordered by Judge Cecchi, the opposition was due 45 days after Defendants' motion to dismiss (which motion was filed on November 10, 2011).

I apologize to the Court and to all counsel for this error. I incorrectly calendared the deadline, believing that the stipulation provided 60 days, rather than 45 days to oppose the motion. I have spoken with Christopher Gette, counsel for Kid Brands, Inc. He indicated that Defendants¹ will take no position on a request by Lead Plaintiff to file the opposition brief on Monday, January 9, 2012.

In light of the foregoing, we respectfully request an extension to oppose Defendants' motion to dismiss to Monday, January 9, 2012.

Respectfully submitted,


Kim E. Miller

Cc: Jeffrey W. Hermann, Esq. (by email)
Robert J. Del Tufo, Esq. (by email)

¹ Mr. Gette attempted to contact Mr. Fisher, counsel for defendant Bruce Crain, today via email and telephone regarding this issue but Mr. Fisher could not be reached. Aside from Mr. Crain, all remaining Defendants take no position on Plaintiff's request.

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Rebecca Brazzano, Esq. (by email)
David A. Wilson, Esq. (by email)
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